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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-9

Chapter 9

Date: January 11, 2018
Time: 9:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

REPLY TO RESPONSE TO MOTION FOR AUTHORIZATION TO REJECT
EXECUTORY CONTRACT
(MEDFLOW, PC)

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1 TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY
2 JUDGE:

3 Tulare Local Healthcare District dba Tulare Regional Medical Center
4 ("District") respectfully comes before the Court and replies to the Response of
5 Medflow, PC to the District's Motion for Authorization to Reject Executory Contract
6 as follows.

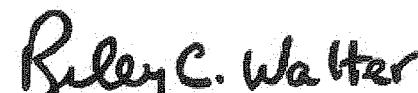
7 The District understands why Medflow and Yorai ("Benny") Benzeevi, M.D.
8 and HCCA feel the need to "make a record" with respect to the subject motion.
9 However, the District stands by its position that it does not need nor want a
10 continuing contractual relationship with Medflow and that in its business judgment
11 the agreement in question is not favorable to the District, that the District will save
12 money by rejecting the agreement and that the agreement should be rejected
13 pursuant to Section 365.

14 WHEREFORE, Tulare Local Healthcare District dba Tulare Regional
15 Medical Center prays that the contract between it and Medflow, PC be rejected
16 and it seeks entry of an Order setting a date by which the rejection claim, if any,
17 must be filed.

18 Dated: January 3, 2018

WALTER WILHELM LAW GROUP,
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21 By:



Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District dba Tulare
Regional Medical Center